

Given that claims 2, 6, 10-11 and 17-18 depend from claim 1, Assignee submits that these claims are also patentable over Smiley.

Claim 21 recites “the first program further for using the definition to generate the set of tables.” Smiley does not disclose “the first program further for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 21 is patentable over Smiley. Given that claims 22, 26-27 and 29 depend from claim 21, Assignee submits that these claims are also patentable over Smiley.

Claim 30 recites “means for using the definition to generate the set of tables.” Smiley does not disclose “means for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 30 is patentable over Smiley. Given that claims 31 and 36 depend from claim 30, Assignee submits that these claims are also patentable over Smiley.

Claims 38 and 43 recite “instructions for using the definition to generate the set of tables.” Smiley does not disclose “instructions for using the definition to generate the set of tables.” Therefore, Assignee submits that claims 38 and 43 are patentable over Smiley. Given that claim 39 depends from claim 38, Assignee submits that this claim is also patentable over Smiley. Given that claim 44 depends from claim 43, Assignee submits that this claim is patentable over Smiley.

### **Claim Rejections – §103**

Claims 3, 5, 23, 25, 32, 34, 40, 42, 45 and 47 stand rejected under 35 U.S.C. 103 based on Smiley in view of U.S. Patent No. 5,295,256 issued to Bapat (“Bapat”).

As discussed above, Smiley does not disclose “the computer using the definition to generate the set of tables.”

The Office action states that “Bapat teaches generating a foreign key column.” As the Examiner implicitly concedes, however, that Bapat does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley and Bapat were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in

claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Bapat. Given that claims 3 and 5 depend from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Bapat.

Claim 21 recites “the first program further for using the definition to generate the set of tables.” Smiley and Bapat, alone or in combination, neither teach nor suggest “the first program further for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 21 is patentable over Smiley in view of Bapat. Given that claims 23 and 25 depend from claim 21, Assignee submits that these claims are also patentable over Smiley in view of Bapat.

Claim 30 recites “means for using the definition to generate the set of tables.” Smiley and Bapat, alone or in combination, neither teach nor suggest “means for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 30 is patentable over Smiley in view of Bapat. Given that claims 32 and 34 depend from claim 30, Assignee submits that these claims are patentable over Smiley in view of Bapat.

Claims 38 and 43 recite “instructions for using the definition to generate the set of tables.” Smiley and Bapat, alone or in combination, neither teach nor suggest “instructions for using the definition to generate the set of tables.” Therefore, Assignee submits that claims 38 and 43 are patentable over Smiley in view of Bapat. Given that claims 40 and 42 depend from claim 38, Assignee submits that these claims are patentable over Smiley in view of Bapat. Given that claims 45 and 47 depend from claim 43, Assignee submits that these claims are patentable over Smiley in view of Bapat.

Claims 4, 7, 24, 33, 41 and 46 stand rejected under Smiley in view of U.S. Patent No. 5,249,300 issued to Bachman et al. (“Bachman”).

As discussed above, Smiley does not disclose “the computer using the definition to generate the set of tables.”

The Office action states that “Bachman teaches ... many to many relationship.” The Examiner implicitly concedes, however, that Bachman does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley and Bachman were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Bachman. Given that claims 4 and 7 depend from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Bachman.

Claim 21 recites “the first program further for using the definition to generate the set of tables.” Smiley and Bachman, alone or in combination, neither teach nor suggest “the first program further for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 21 is patentable over Smiley in view of Bachman. Given that claim 24 depends from claim 21, Assignee submits that this claim is also patentable over Smiley in view of Bachman.

Claim 30 recites “means for using the definition to generate the set of tables.” Smiley and Bachman, alone or in combination, neither teach nor suggest “means for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 30 is patentable over Smiley in view of Bachman. Given that claim 33 depends from claim 30, Assignee submits that this claim is patentable over Smiley in view of Bachman.

Claims 38 and 43 recite “instructions for using the definition to generate the set of tables.” Smiley and Bachman, alone or in combination, neither teach nor suggest “instructions for using the definition to generate the set of tables.” Therefore, Assignee submits that claims 38 and 43 are patentable over Smiley in view of Bachman. Given that claim 41 depends from claim 38, Assignee submits that this claim is patentable over Smiley in view of Bachman. Given that claims 46 depends from claim 43, Assignee submits that this claim is patentable over Smiley in view of Bachman.

Claim 8 stands rejected under 35 U.S.C. 103 based on Smiley in view of U.S. Patent No. 6,263,341 issued to Skinner et al. (“Skinner”).

As discussed above, Smiley does not disclose “the computer using the definition to generate the set of tables.”

The Office action states that “Skinner teaches a date column.” The Examiner implicitly concedes, however, that Skinner does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley and Skinner were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Skinner. Given that claim 8 depends from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Skinner.

Claim 9 stands rejected under 35 U.S.C. 103 based on Smiley in view of U.S. Patent No. 6,167,405 issued to Rosensteel (“Rosensteel”).

As discussed, Smiley does not disclose “the computer using the definition to generate the set of tables.”

The Office action states that “Rosensteel teaches a source system key column.” The Examiner implicitly concedes, however, that Rosensteel does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley and Rosensteel were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Rosensteel. Given that claim 9 depends from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Rosensteel.

Claims 12-16, 19 and 28 stand rejected under 35 U.S.C. 103 based on Smiley in view of U.S. Patent No. 5,272,628 issued to Koss (“Koss”).

As discussed above, Smiley does not disclose “the computer using the definition to generate the set of tables.”

The Office action states that “Koss teaches a method comprising...creating a set of aggregate tables.” The Examiner implicitly concedes, however, that Koss does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley and Koss were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Koss. Given that claims 12-16 and 19 depend from claim 1, Assignee submits that these claims are also patentable over Smiley in view of Koss.

Claim 21 recites “the first program further for using the definition to generate the set of tables.” Smiley and Koss, alone or in combination, neither teach nor suggest “the first program further for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 21 is patentable over Smiley in view of Koss. Given that claim 28 depends from claim 21, Assignee submits that this claim is also patentable over Smiley in view of Koss.

Claim 20 stands rejected under 35 U.S.C. 103 based on Smiley in view of U.S. Patent No. 6,282,544 issued to Tse et al. (“Tse”).

As discussed above, Smiley does not disclose “the computer using the definition to generate the set of tables.”

The Office action states that “Tse teaches a datamart.” The Examiner implicitly concedes, however, that Tse does not disclose “the computer using the definition to generate the set of tables.”

As a result, even if Smiley and Tse were combined, the combination would neither teach nor suggest “the computer using the definition to generate the set of tables,” as recited in claim 1. Therefore, Assignee submits that claim 1 is patentable over Smiley in view of Tse. Given that claim 20 depends from claim 1, Assignee submits that this claim is also patentable over Smiley in view of Tse.

Claim 35 stands rejected under 35 U.S.C. 103 based on Smiley in view of Bapat and further in view of Koss.

Claim 30 recites “means for using the definition to generate the set of tables.” Smiley, Bapat, and Koss, alone or in combination, neither teach nor suggest “means for using the definition to generate the set of tables.” Therefore, Assignee submits that claim 30 is patentable

over Smiley in view of Bapat and further in view of Koss. Given that claim 35 depends from claim 30, Assignee submits that this claim is patentable over Smiley in view of Bapat and Koss.

Claim 37 stands rejected under 35 U.S.C. 103 based on Smiley in view of Koss and further in view of Bachman.

Claim 30 recites "means for using the definition to generate the set of tables." Smiley, Koss, and Bachman, alone or in combination, neither teach nor suggest "means for using the definition to generate the set of tables." Therefore, Assignee submits that claim 30 is patentable over Smiley in view of Koss and further in view of Bachman. Given that claim 37 depends from claim 30, Assignee submits that this claim is patentable over Smiley in view of Koss and Bachman.

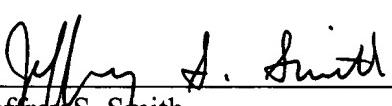
Accordingly, withdrawal of the Examiner's rejection of claims 1-47 is respectfully requested.

### **Conclusion**

Reconsideration and allowance of claims 1-47 are respectfully requested. If the Examiner's next action is other than the allowance of all pending claims, the Examiner is invited to call the Assignee's attorney at (650) 849-4422.

DATE: October 31, 2002

Respectfully submitted,

By:   
Jeffrey S. Smith  
Registration No.: 39,377

Bingham McCutchen LLP  
Three Embarcadero Center  
San Francisco, California 94111  
Telephone: (650) 849-4400  
Telefax: (650) 849-4800

Express Mail Label No.:  
EV 154 652 192 US